



# NARA COVID-19 Response

## **Fact Sheet #8, version 5: Contact tracing procedure**

June 9, 2021

*This fact sheet provides guidance to help protect NARA staff and reduce the spread of the 2019 novel coronavirus disease (COVID-19) in the workplace. This version has been updated to include reporting to State and local public health officials and to expand internal reporting to notify all staff at a facility of a potential exposure. Fully vaccinated employees and contractors are no longer required to report a close contact outside of work. Anyone who reports a close contact outside of work will be treated as an unvaccinated person. In addition, NARA will no longer require quarantine for close contacts by fully vaccinated employees and contractors who are not experiencing symptoms, and will no longer deep clean workspace if an on-site employee or contractor reports a close contact with someone outside the facility. This version supersedes all previous versions of this guidance.*

**Information regarding persons who have reported positive COVID-19 tests, COVID-19 symptoms, or close contact with someone with COVID-19 must be treated as personally identifiable information (PII). NARA officials and contractors are currently not authorized to ask about vaccination status or request proof of vaccination from employees, contractors, or the public.**

### **1. Determine the scope of the potential exposure.**

- a. NARA employees and contractors are required to report to their supervisor (for employees) or COR (for a contractor) if they are diagnosed with COVID-19 or are experiencing COVID-19 symptoms. Employees and contractors who are not fully vaccinated are also required to report any close contact with someone who has been diagnosed with COVID-19. Fully vaccinated means it has been at least two weeks since the individual's second dose of a two-dose COVID-19 vaccine series, or two weeks since receiving a single-dose vaccine.
- b. When an individual reports that they have been diagnosed with COVID-19, is experiencing COVID-19 symptoms, or has come in close contact with someone who has been diagnosed with COVID-19, the supervisor (for an employee) or COR (for a contractor) should immediately attempt to determine the following information and record the answers:
  - i. Have you been in the facility in the past two weeks?

- ii. If yes, were you in the facility:
  - (1) In the *last two days before* you were diagnosed or first felt ill;
  - or
  - (2) In the *last 14 days after* you came in close contact with someone who has been diagnosed with COVID-19?
- iii. If yes:
  - (1) Where did you spend most of your time in the facility in the two days before you were diagnosed or first felt ill, or the 14 days after you came in close contact with someone diagnosed with COVID-19?
  - (2) In the two days before you were diagnosed or first felt ill, or 14 days after you came in close contact with someone diagnosed with COVID-19, was there anyone else in the facility who you were within 6 feet of for a total of 15 minutes or more over a 24-hour period?

A close contact may include one, continuous exposure lasting longer than 15 minutes or multiple, shorter exposures that, in total, add up to more than 15 minutes in a 24-hour period.
- c. Once collected, this information must only be used and disclosed for the purpose and in the manner described in this document. This information relates to the health status of both the sick or exposed person and any other employees or contractors who were exposed to that person. This information must be treated as personally identifiable information (PII) and protected from inadvertent disclosure.
- d. To the greatest possible extent, this information should be collected at the time the diagnosis, symptoms, or close contact are first reported.
  - i. The supervisor should attempt to collect this information at the time the employee first reports her or his diagnosis, symptoms, or potential exposure. The COR should collect this information when a contractor employee or their project manager reports the diagnosis, symptoms, or potential exposure.
  - ii. If the information is not gathered immediately, the supervisor, COR, or Designated Official must make at least one additional attempt to collect the information.

- iii. If the individual does not respond, refuses to provide the requested information, or is incapable of providing the information, the supervisor, COR, or Designated Official should make a record of her or his attempt(s) to contact the individual and discontinue further attempts to gather contact information.

## **2. Keep sick and exposed individuals at home.**

- a. An individual is not permitted to enter any NARA facility for at least 10 calendar days after they *report* that they have been diagnosed with COVID-19 or is experiencing symptoms of COVID-19 (“home isolation”). An individual who reports a close contact with someone who has been diagnosed with COVID-19 is not permitted to enter any NARA facility for at least 14 days after their last contact with the person who has COVID-19 (“quarantine”). Fully vaccinated employees and contractors are not required to report a close contact outside of work: Anyone who reports a close contact outside of work will be treated as an unvaccinated person.
  - i. A NARA employee who is on NARA-initiated home isolation or quarantine but is not experiencing symptoms may telework or may be granted weather and safety leave, according to NARA’s leave policy. An employee on home isolation or quarantine who is experiencing symptoms must take sick (or other personal) leave.
  - ii. A contractor employee who is on NARA-initiated home isolation or quarantine and is unable to telework must follow their employer’s leave policy.
- b. Return to work.
  - i. No symptoms.
    - (1) An individual who is placed on home isolation (for a COVID-19 diagnosis) without symptoms may return to work after 10 calendar days of experiencing no symptoms.
    - (2) An individual who is placed on quarantine (for potential exposure to COVID-19) and does not experience symptoms may return to work 14 calendar days after last contact with the sick person.
  - ii. Symptom based. An individual who is placed on home isolation due to COVID-19 symptoms or who experiences symptoms after being placed on home isolation or quarantine may return to work on the first work day after the date that all of the following conditions are met:
    - (1) 24 hours have passed since the individual’s fever is resolved

without the use of fever-reducing medication; **and**

(2) At least ten calendar days have passed since they first experienced symptoms; **and**

(3) Any symptoms have improved.

**3. Clean the facility to limit potential spread.**

- a. If the sick person has not been in the facility in the 14 calendar days prior to reporting to the supervisor or COR, the facility does not need to be cleaned, regardless of when the employee was actually diagnosed or first experienced symptoms. The facility also does not need to be cleaned if a NARA employee or contractor reports a close contact with someone outside the facility who was diagnosed with COVID-19.
- b. If the sick person has been in the facility any of the 14 calendar days prior to reporting, the Designated Official must ensure the following actions are taken.
  - i. As soon as practicable, close off the areas of the facility that the person entered, visited, or worked in before they were diagnosed or first felt ill;
  - ii. If feasible, close off the areas that the person spent the most time in (i.e. the employee's response to the question at 1.a.iii(1), above) for 24 hours prior to cleaning.
  - iii. Arrange for the custodial contractor to deep clean those areas using NARA's scope of work – *NARA Deep Cleaning and Disinfecting 04072020*.
- c. If the sick person has been in records or artifact storage space in any of the 14 calendar days prior to reporting, the Designated Official must coordinate with the supervisor to ensure the following actions are taken.
  - i. Close all stacks or bays in which the sick person last worked;
  - ii. Use an approved disinfectant to wipe down all high touch areas of the stack or bay (e.g. door handles, control panels for moveable shelves), as well as any carts, long Johns / streamliners, pallet jacks, ladders, and any other material handling equipment used by the sick person.
  - iii. For textual records: If the sick person handled any boxes or textual records, do not allow other employees to handle those boxes or records for three calendar days from the last handling by the sick person. Close off and mark the individual compartment(s) or row(s), as appropriate, containing the materials and mark with signage.

- iv. For artifacts, items in cold storage, or special media: Please consult with the Preservation Programs Division (RX).

**4. Notify staff of a potential exposure and place exposed individuals on home isolation.**

- a. If the sick or exposed person has not been in the facility in the 14 calendar days prior to reporting to the supervisor or COR, staff do not need to be notified, regardless of when the employee was actually diagnosed, first felt symptoms, or had close contact with someone who was diagnosed with COVID-19.
- b. If the sick or exposed person has been in the facility in any of the 14 calendar days prior to reporting, the Designated Official must notify NARA employees and contractors who work in the facility of the potential exposure.
  - i. The Designated Official will send an email to all NARA employees assigned to the facility, regardless of whether or when they were last in the facility. The Designated Official will ensure that all CORs notify the vendor(s) of any contractor employees who were in the facility in the same 14 calendar day period.
  - ii. All notifications must protect the identity of the sick or exposed person. A sample notification is provided at the end of this document.
- c. If the sick or exposed person has been in the facility in the last two calendar days before they were diagnosed with COVID-19 or first experienced symptoms of COVID-19, or in the 14 days after they had close contact with someone who was diagnosed with COVID-19, the Designated Official must work with the appropriate supervisors or COR to take the following actions (in addition to the notifications in paragraph 4b, above):
  - i. If the sick or exposed person identifies any individuals with whom they had close contact (in response to the question at 1.a.iii(3), above), those individuals *must* be quarantined for 14 calendar days after the last contact, according to the procedure in paragraph 2, above.
  - ii. If the Designated Official, supervisor, or COR knows of any other employee or contractor (not named by the sick or exposed person) who was within 6 feet of the sick or exposed person for a total of 15 minutes or more in a 24-hour period, during the two calendar days before the sick or exposed person was diagnosed, first experienced symptoms, or was in close contact with someone diagnosed with COVID-19, those individuals *may* be quarantined for 14 calendar days after the last contact, according to the procedure in paragraph 2, above.

- iii. Exception: Any individuals identified in paragraphs 4.c.i or 4.c.ii, above, who voluntarily self-identify as fully vaccinated and who are not experiencing COVID-19 symptoms may voluntarily opt-out of quarantine at their discretion.

**5. Report the incident and your response to [neeo@nara.gov](mailto:neeo@nara.gov).**

- a. After sending the sick or exposed person home, arranging for cleaning, and notifying local staff, the Designated Official must report the incident to the Office of Equal Employment Opportunity (NEEO) at [neeo@nara.gov](mailto:neeo@nara.gov).
- b. The Designated Official must report to NEEO any time an employee reports that they have received a COVID-19 diagnosis, is experiencing COVID-19 symptoms, or has been exposed to someone who has been diagnosed with COVID-19. This applies to any report by any employee, regardless of whether they are teleworking or working on site. The Designated Official must also report all employees who are quarantined due to a workplace exposure, as described in paragraph 4c, above.
- c. At a minimum, the Designated Official or supervisor will provide the following information to NEEO. This includes both the initial sick or exposed person (see paragraph 1a, above) and any NARA employees or contractors who are quarantined as a result of contact with that person (see paragraph 4c, above). NEEO may establish additional reporting requirements, as needed.
  - i. Today's date;
  - ii. Facility name;
  - iii. Name of individual;
  - iv. Individual's affiliation (e.g. employee, contractor);
  - v. Reason for being placed on home isolation or quarantine (e.g. diagnosed with COVID-19, symptoms of COVID-19, close contact with someone who has been diagnosed with COVID-19, potential workplace exposure);
  - vi. Reason start date (i.e. date the person was diagnosed, first experienced symptoms, came in close contact with someone who was diagnosed, or was notified of a potential workplace exposure); and
  - vii. Isolation or quarantine start date (i.e. date the person first reports a diagnosis or symptoms, or the date of the last close contact).
- d. NEEO will collect data and maintain records of employees who are placed on home isolation or quarantine due to COVID-19. NEEO will provide summary data (with names removed) to the Office of Human Capital (H) and the Security

Management Division (BX) for internal and external reporting. Designated Officials, supervisors, and CORs should only maintain the minimum records necessary to support an absence, according to local procedures, without retaining health information of affected employees.

**6. Notify State or local public health officials, as appropriate**

- a. The Designated Official will report any potential workplace exposure to state or local public health departments (LPHD), if and to the extent required by state or local public health orders. Different states, counties, and cities have established their own rules for what employers are required to report when a building occupant reports a COVID-19 diagnosis, symptoms, or close contact. The Designated Official fulfills NARA's responsibilities for employer reporting to LPHDs.
- b. Designated Officials should coordinate with LPHDs in advance, in order to understand COVID-19 reporting requirements before a potential exposure occurs. A table of state reporting requirements (current as of the date of this Fact Sheet) is provided as paragraph 10, below. If a state requirement is listed, the Designated Official only has to comply with the state requirement; if no state requirement is listed, the Designated Official should contact their county or city public health agency for reporting guidance. Not all jurisdictions require employer reporting: Some LPHDs only collect information from health care providers; in other jurisdictions, privacy laws limit the employer's involvement in reporting employee health information.
- c. Designated Officials should not coordinate or report potential workplace exposures for state workers' compensation programs. Designated Officials should only report potential exposures to LPHDs. Designated Officials should not report potential exposures to LPHDs if the exposure occurred before the date of issuance of this Fact Sheet.

**7. Sample notification message.**

Dear Colleagues:

As the Designated Agency Official for the *[location]*, I am sending this email to inform you that an occupant of our building was recently diagnosed with COVID-19. The individual was diagnosed on *[date]*, but has not been in the building since *[date]*. This notification is being sent to all employees assigned to *[location]*, regardless of whether you were in the facility or not.

The infected individual's movement in the building was primarily limited to *[define if possible or whole building]*. Those areas are closed and will be cleaned as soon as possible *[or already cleaned]*.

I am providing this for your information. You have not been identified as having close contact with this individual so there is no need to self-isolate or quarantine. In the event you display any potential symptoms, please let me know, and you should reach out to your medical provider for guidance as deemed appropriate by them.

If you have questions about this notice, please contact [*yourself or someone you may delegate to*]

## **8. Sample script for placing an employee on home isolation:**

Dear [*Contact Name*], You were identified as having had contact with a person who has been diagnosed with COVID-19 or is experiencing symptoms of COVID-19 in our facility.

Because you have had contact with an infected person, you are being quarantined for 14 calendar days. If you are not experiencing symptoms you may telework or you may be granted weather and safety leave, according to NARA policy.

If you become ill, please call your supervisor [*or me*] and seek medical attention. If you become ill you must take sick (or other personal) leave.

You may not be infected and, even if you are infected, you may not experience symptoms. Please take this quarantine seriously. There is guidance on CDC's website on how to quarantine when you have been in close contact with an ill person.

Please contact your supervisor [*or me*] if you have any questions.

## **9. References.**

- a. Returning to work: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html>
- b. Good overall site: <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>
- c. Close contact (< 6 ft and > 15 mins): <https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html>
- d. Notification standards: <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>
- e. Cleaning standards: <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>
- f. Three days for "record quarantine" is based on research by the IMLS project on Reopening Archives, Libraries, and Museums (REALM), which found that the



virus that causes COVID-19 was no longer detectable after a quarantine of:

- 3 days for plain paper (<https://www.webjunction.org/news/webjunction/test1-results.html>); and
- 2 days for archival folders (<https://www.webjunction.org/news/webjunction/test2-results.html>).

- g. List of all state and territorial health department websites:  
<https://www.cdc.gov/publichealthgateway/healthdirectories/healthdepartments.html>

## 10. State reporting requirements for employers.

State	Reporting requirement
ARKANSAS	We could not find any state-level reporting requirement for employers; please check your county or city public health authority for local requirements.
CALIFORNIA	Report to your local public health department within 48 hours whenever three or more facility occupants who live in different households test positive for COVID-19 occur at a worksite within a 14-day period. <a href="https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/ab685.aspx">https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/ab685.aspx</a>
COLORADO	Report to your county public health agency if two or more on-site employees test positive for COVID-19 within 14 days. <a href="https://covid19.colorado.gov/workplace-outbreak-guidance">https://covid19.colorado.gov/workplace-outbreak-guidance</a>
DISTRICT OF COLUMBIA	Notify DC Health if an employee who frequently interacts with customers tests positive for COVID-19 AND the person was in the building during the two days before or 10 days after the positive test result. <a href="https://dchealth.dc.gov/page/covid-19-reporting-requirements">dchealth.dc.gov/page/covid-19-reporting-requirements</a> .
GEORGIA	We could not find any state-level reporting requirement for employers; please check your county or city public health authority for local requirements.
ILLINOIS	Notify your local public health department within 24 hours if two or more employees report COVID-19 symptoms or test positive for COVID-19. <a href="https://www.dph.illinois.gov/covid19/community-guidance/workplace-health-and-safety-guidance/employee-employer-rights-and-safety">https://www.dph.illinois.gov/covid19/community-guidance/workplace-health-and-safety-guidance/employee-employer-rights-and-safety</a>
IOWA	We could not find any state-level reporting requirement for employers; please check your county or city public health authority for local requirements.

<b>State</b>	<b>Reporting requirement</b>
KANSAS	If a facility occupant tests positive for COVID-19, notify the local public health department the names of any individuals who had close contact with the sick person in the workplace for the two days prior and 10 days after the positive test. <a href="https://www.coronavirus.kdheks.gov/DocumentCenter/View/993/Guidance-for-Businesses-to-Respond-to-COVID-19-PDF---12-11-2020">https://www.coronavirus.kdheks.gov/DocumentCenter/View/993/Guidance-for-Businesses-to-Respond-to-COVID-19-PDF---12-11-2020</a>
MARYLAND	We could not find any state-level reporting requirement for employers; please check your county or city public health authority for local requirements.
MASSACHUSETTS	Notify the local Board of Health of your city or town immediately if a facility occupant tests positive for COVID-19. <a href="https://www.mass.gov/info-details/safety-standards-and-checklist-office-spaces">https://www.mass.gov/info-details/safety-standards-and-checklist-office-spaces</a>
MICHIGAN	Notify local public health officials immediately of any possible cases (positive test results or symptoms) of COVID-19. <a href="https://www.michigan.gov/documents/coronavirus/Offices_Informed_Choice_06_10_2020_693891_7.pdf">https://www.michigan.gov/documents/coronavirus/Offices_Informed_Choice_06_10_2020_693891_7.pdf</a>
MISSOURI	The State does not require employer reporting; please check your county or city public health authority for local requirements.
NEW YORK	Notify state and local health departments immediately when an on-site employee reports a positive COVID test and, if an on-site employee or facility visitor reports COVID symptoms or test results, notify the state and local health departments of all building occupants for 48 hours prior to the symptoms or test results, whichever is earlier. <a href="https://www.governor.ny.gov/sites/default/files/atoms/files/offices-interim-guidance.pdf">https://www.governor.ny.gov/sites/default/files/atoms/files/offices-interim-guidance.pdf</a>
OHIO	Immediately report employee or customer infections to the local health district. <a href="https://businesshelp.ohio.gov/pdf/Responsbile-Protocols-Bulletin-04302020.pdf">https://businesshelp.ohio.gov/pdf/Responsbile-Protocols-Bulletin-04302020.pdf</a>
PENNSYLVANIA	We could not find any state-level reporting requirement for employers; please check your county or city public health authority for local requirements.
TEXAS	We could not find any state-level reporting requirement for employers; please check your county or city public health authority for local requirements.

State	Reporting requirement
WASHINGTON	Notify your local health department within 24 hours if more than two employee test positive in a 14 day period. <a href="https://www.doh.wa.gov/Portals/1/Documents/1600/coronavirus/Checklist-BusinessesSuspectedConfirmedCasesCOVID-19.pdf">https://www.doh.wa.gov/Portals/1/Documents/1600/coronavirus/Checklist-BusinessesSuspectedConfirmedCasesCOVID-19.pdf</a>
WEST VIRGINIA	We could not find any state-level reporting requirement for employers; please check your county or city public health authority for local requirements.

**Point of Contact:** If you have questions or comments, please contact the Occupational Safety and Health Program Office at [safety@nara.gov](mailto:safety@nara.gov).